

## February 19, 2009 Via ECFS Transmission

2600 Maitland Center Pkwy.

Suite 300

Maitland, FL 32751

P.O. Drawer 200

Winter Park, FL

32790-0200

Tel: 407-740-8575

Fax: 407-740-0613

www.tminc.com

Ms. Marlene H. Dortch, FCC Secretary

Office of the Secretary

Federal Communications Commission 445 12<sup>th</sup> Street, SW, Suite TW-A325

Washington, DC 20554

RE: Southeastern Services, Inc. - 2008 CPNI Certification Filing

EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of Southeastern Services, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to <a href="mailto:rnorton@tminc.com">rnorton@tminc.com</a>.

Sincerely,

Robin Norton

Consultant to Southeastern Services, Inc.

Robin Noton

RN/lm

cc:

Best Copy and Printing, Inc. - FCC@BCPIWEB.COM

cc:

FCC Enforcement Bureau (2 copies)

cc: file: Marc Woods - Southeastern Southeastern - FCC

tms:

FCCx0901

## ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year:

2008

Name of company covered by this certification:

Southeastern Services, Inc.

Form 499 Filer ID:

824546

Name of signatory:

Mark Woods

Title of signatory:

President

## I, Mark Woods, certify and state that:

- 1. I am the President of Southeastern Services, Inc. and, acting as an agent of the company, I have personal knowledge of Southeastern Services, Inc.'s operating procedures as they relate to CPNL and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, Southeastern Services. Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Mark Woods, President Southeastern Services, Inc.

Exhibit A
Statement of CPNI Procedures and Compliance

## Statement of CPNI Procedures and Compliance For 2008 Southeastern Services, Inc.

Southeastern Services, Inc. is a small rural CLEC providing local and long distance service to business customers in one state.

We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. We have has trained our personnel not to use CPNI for marketing purposes. Should we elect to use CPNI in future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

As explained below, we have put into place processes to safeguard its customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

We do not disclose CPNI online. We currently provide and have in place well established procedures for providing call detail over the phone. All new customers are currently required to come to our office when initiating service. At this time, a photo ID is required. In the event a customer's password is lost or stolen, the customer must answer security questions which were determined at the time service was initiated and a new password is set up. No call detail will be disclosed unless the customer provides a valid password or provides the call detail information that is the subject of the inquiry without a customer service representative's assistance. If the customer does not provide a password or cannot provide the call detail information without a customer service representative's assistance, then we will only send the call detail to the customers address of record or by calling the customer at the telephone number on record.

For billing inquiries, changes to account information or to add, delete, or change services, customers are required to come into the office and present a valid photo ID.

Employees are trained and fully understand the fact that we do not allow customer information to be given out for any reason. If using a customer's personal information to maintain an account, employees are trained to properly dispose of or return the customer's information to its secured location.

We have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not experienced any breaches of CPNI to date, but will maintain records, either written or electronic, of any and all breaches discovered and notifications made to the USSS and the FBI, and to customers.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

We do not have any information with respect to the processes Pretexters are using to attempt to access CPNI.